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November 17, 2021

BY ECF

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Luka Klasinc, 21-CR-443 (AKH) (S.D.N.Y.)

Dear Judge Hellerstein:

On November 10, 2021, the parties in the above-captioned case appeared before this Court for a bail hearing. Upon the application of the defense and over the objection of the Government, the Court has ordered the defendant's release upon satisfaction of the following conditions:

- \$1,000,000 personal recognizance bond, secured by:
 - o \$585,000 in equity from the property owned by Grace Knox¹ located at [REDACTED];
 - o \$415,000 cash deposited by Robert Knox;
- Home incarceration at [REDACTED], to be enforced by location monitoring (technology to be determined by pretrial services);
- Location monitoring to be installed prior to release from custody;

The following conditions shall apply to the defendant's release:

- Defendant is to be transported by counsel to [REDACTED] immediately upon release from federal custody;
- Counsel shall notify Pretrial Services Officer Laura Gialanella upon arrival at [REDACTED]

¹ On November 16, 2021, the Court approved defense counsel's proposed amendment to the bail conditions, whereby Grace Knox, as opposed to Robert Knox, is properly included as the owner of the property being used to secure Mr. Klasinc's release.

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- [REDACTED]
- Strict pretrial supervision;
 - The defendant shall have no visitors without prior approval from pretrial services and the Government;
 - The defendant may not possess internet capable devices;
 - The defendant may not access the internet;
 - The defendant's computer access shall be limited to discovery review in the presence of counsel;
 - Except in the presence of counsel, the defendant may not have contact with any known victims or witnesses including [REDACTED];
 - No involvement with "BOB77, LLC" business or contact with employees of said business;
 - Surrender all travel documents and make no new applications;
 - Defendant may not possess identity documents belonging to other individuals;
 - Defendant may not open any new bank accounts or lines of credit without prior approval from pretrial services;
 - Defendant may not possess firearms, destructive devices, or other weapons;

Wherefore, the defense respectfully requests that the Court so order the modification described above.

Respectfully Submitted,

Jeffrey Lichtman

So Ordered:


Hon. Alvin K. Hellerstein

cc: Ashley Nicholas (AUSA)
Laura Gialanella (Pretrial Services)